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April 27, 2022

Via Electronic Filing
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. R-2022-3031211, Columbia Gas of Pennsylvania Supplement No. 337 to
Tariff Gas – Pa. P.U.C. No. 9**

Dear Secretary Chiavetta:

Please find enclosed a **Petition to Intervene and Answer of the Natural Resources Defense Council (NRDC)** for filing in the above-referenced proceeding. Parties are being served as indicated in the attached certificate of service.

Please contact me if you have any questions concerning this matter.

Thank you very much.

Sincerely,

Andrew J. Karas
Andrew J. Karas, Esq.
Counsel for NRDC

cc: Per certificate of service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Columbia Gas of Pennsylvania Supplement :
No. 337 to Tariff Gas – Pa. P.U.C. No. 9 : Docket No. R-2022-3031211

**PETITION TO INTERVENE AND ANSWER OF THE
NATURAL RESOURCES DEFENSE COUNCIL**

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DATE: April 27, 2022

Pursuant to 52 Pa. Code §§ 5.61 – 5.76, the Natural Resources Defense Council (“NRDC”) hereby petitions the Commission to intervene in these proceedings and files its Answer. In support thereof, NRDC states as follows:

1. NRDC is an environmental organization and not-for-profit corporation with more than 1.4 million members, including more than 16,000 in Pennsylvania. Since 1970, NRDC’s attorneys, scientists, and other environmental specialists have worked to protect the world’s natural resources, public health, and the environment. NRDC’s top institutional priority is building an equitable clean energy future in which the pollution impacts of extracting and combusting fossil fuels are minimized, if not eliminated.

2. On March 18, 2022, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “the Company”) submitted a rate filing, Supplement No. 337 to Tariff Gas – Pa. P.U.C. No. 9, which proposes, *inter alia*, a general increase in gas distribution rates of \$82.2 million per year.¹ The need for this rate increase is purportedly driven by the need for infrastructural improvements to Columbia’s existing distribution system.²

3. The rate filing additionally proposes several new initiatives, including, *inter alia*, establishment of a revenue normalization adjustment mechanism and energy efficiency programs incentivizing customers to take certain energy-reduction measures.³

4. On April 26, 2022, the Company moved to consolidate its proposed green path rider tariff – a pilot proposal allowing customers to elect to pay for “renewable natural gas” supply and carbon offsets – with the instant proceeding.⁴

¹ Columbia Stmt. No. 1, 7:1.

² *Id.* at 6-7.

³ *Id.*; *See generally* Columbia Stmt. No. 16.

⁴ Company’s Mot. to Consolidate (Apr. 26, 2022).

Petition to Intervene

5. 52 Pa. Code § 5.72 provides that a party's intervention in a proceeding is appropriate where that party possesses "[a]n interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding[,]" or otherwise has "[a]nother interest of such nature that participation of the petitioner may be in the public interest."

6. NRDC has previously intervened in Commission proceedings to advance its institutional goals across a wide range of energy issues, including customer assistance program design and energy equity, transportation electrification, and distributed energy policy, among others.

7. NRDC's interests in this proceeding are unique from are not adequately represented by any other party.

8. NRDC's participation in this proceeding will benefit the public interest.

9. NRDC will be represented in this proceeding by:

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10. Counsel for NRDC consents to the service of documents exclusively by electronic mail to the addresses for the above-listed counsel, as provided in 52 Pa. Code 1.54(b)(3).

Answer

11. NRDC is continuing to review the Company's filings. NRDC believes that numerous issues in this case will affect the interests of NRDC's members and NRDC's institutional goals of expanding the use of energy efficiency, renewable energy, and building an equitable clean energy future.

12. Principally, NRDC intends to address the Company's proposed "Green Path Rider" tariff and whether the program adequately accounts for climate goals and the need for a just and timely transition from fossil fuels.

13. NRDC reserves the right to address other issues of concern related the Company's rate filings, including but not limited to the justness and reasonableness of the proposed general rate increase, the Company's proposals regarding expansion and maintenance of its distribution system, the Company's proposed Revenue Normalization Adjustment's adherence to principles and best practices of alternative rate design, the Company's proposal for energy efficiency incentivization programs, and the design of low-income customer assistance programs.

Respectfully submitted this 27th Day of April, 2022.

/s/ Andrew J. Karas
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CERTIFICATE OF SERVICE

Columbia Gas of Pennsylvania :
Supplement No. 337 to Tariff Gas – Pa. : Docket No. R-2022-3031211
P.U.C. No. 9 :
:

I hereby certify that this day I served a copy of the foregoing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Electronic Mail only:

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Date: 4/27/22

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